

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

Joint Stock Company “Channel One Russia Worldwide,”
Closed Joint Stock Company “CTC Network,” Closed
Joint Stock Company “TV DARIAL,” Closed Joint Stock
Company “New Channel,” Limited Liability Company
“Rain TV-Channel,” Limited Liability Company
“Veriselintel,” Open Joint Stock Company “ACCEPT,”
and Limited Liability Company “Comedy TV.”

Plaintiffs,

v.

INFOMIR LLC (www.infomirusa.com), PANORAMA
ALLIANCE LP, GOODZONE TV (www.gudzon.tv),
MATVIL CORPORATION d/b/a eTVnet
(www.etvnet.com), MIKHAIL GAYSTER ACTAVA TV,
INC. (www.actava.tv), MASTER CALL
COMMUNICATIONS, INC., MASTER CALL
CORPORATION , ROUSLAN TSOUTIEV, and John
Does 1-50.

Defendants.

Index No. 1:16-cv-1318 (GBD)
(BCM)

**NOTICE OF MOTION OF MATVIL CORP D/B/A eTVnet, MATVIL CORP, AND
MIKHAIL GAYSTER TO DISMISS THE COMPLAINT OR IN THE ALTERNATIVE
TO SEVER THE ACTION AND ORDER DEFENDANT JOINT STOCK COMPANY
“CHANNEL ONE RUSSIA WORLDWIDE” FOR A MORE DEFINITE STATEMENT**

Please take notice that upon the accompanying Memorandum of Law, Defendants,
MATVIL CORP. d/b/a eTVnet, (“Matvil Canada”), MATVIL CORP. (“Matvil New York”),
and MIKHAIL GAYSTER (“Gayster,” and together with Matvil Canada and Matvil New
York, the “Matvil Defendants”), will move this Court, before the Honorable George B.
Daniels, at the Daniel Patrick Moynihan United States Courthouse for the Southern District of
New York, 500 Pearl Street, New York, New York 10007, at a date and time to be determined
by the Court, for an Order dismissing the claims of Joint Stock Company “Channel One Russia

Worldwide” (“Channel One”)¹ for failure to state a claim against the Matvil Defendants on the grounds of Fed R. Civ. P. 12(b).

If the Court does not grant motion the above-referenced motion to dismiss as to all of the claims asserted against the Matvil Defendants in the Complaint, the Matvil Defendants respectfully request that the Court sever this case from the other Defendants in this action for misjoinder pursuant to Fed. R. Civ. P. 21 and that the Court order Channel One to make a more definite statement regarding the allegations in the complaint, pursuant to Fed. R. Civ. P. 12(e).

Dated: August 29, 2016

Respectfully Submitted,

LEWIS BAACH PLLC

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d/b/a eTVnet, Matvil Corp., and
Mikhail Gayster*

¹ All of the other Plaintiffs have already dismissed all claims against the Matvil Defendants (Dkt. Nos., 28, 29, 41, 86, 103.)